



November 17, 2014

Sent via Email

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento CA 95814-5512
Attn: Mazi Shirakh
docket@energy.ca.gov

**RE: Docket No. 14-BSTD-01
2016 California Title 24 Update Process: November 3rd Hearing**

Dear Mazi Shirakh,

The American Chemistry Council's Spray Foam Coalition¹ (SFC) is pleased to provide the following comments regarding the discussion and outcomes of the California Energy Commission's (Commission) November 3rd hearing on the 2016 Title 24 update process. The SFC supports the advancement of building energy efficiency through the code and standards development process and looks forward to working with the Commission to update the state's building energy standards.

We are encouraged to see the Commission's emphasis on the use of roof-deck insulation to reduce attic temperatures and improve the efficiency of California homes, and we support your efforts to make High Performance Attics (HPAs) part of the Title 24 Standards. The use of spray polyurethane foam (SPF) insulation is a popular method for the construction of HPAs as it provides a combination of insulating and air sealing benefits not easily found in other technologies.

In order to achieve the maximum benefit from the use of SPF in HPAs, the attic should be unvented to prevent the movement of unconditioned air into the attic and home. This is a popular construction method known as unvented attic (UVA) design. In fact, during the Commission's July 21st hearing, SPF UVA design was presented alongside other attic designs (including vented

¹ The Spray Foam Coalition (SFC) champions the use of spray polyurethane foam in U.S. building and construction applications and promotes its economic, environmental, and societal benefits while supporting the safe manufacture, transport, and application of spray polyurethane foam. SFC consists of manufacturers of spray polyurethane foam systems as well as suppliers of raw materials and machinery used to apply the foam.



above-deck rigid foam insulation and below-deck fiberglass/cellulose insulation) as proposed prescriptive options. However, we note that UVAs were absent from the HPA presentation delivered by Commission representatives on November 3rd. This omission is of great concern to the SFC and has left the SPF industry concerned about the future of UVAs in the Title 24 update process.

We understand that the Commission has since changed its position and plans to include SPF UVA designs as a performance option for meeting the standards, which will require the use of compliance modeling software. However, the current version of the compliance modeling software does not allow the user to model a “conditioned” or “unvented” attic, which effectively excludes the ability to appropriately model the use of SPF. These software errors can cause early-adopters interested in HPAs to select other insulation technologies.

The rationale for why UVAs were removed from consideration as a prescriptive option has not been clearly communicated to the SPF industry. We respectfully request the Commission’s assistance in helping our industry understand why UVA designs were not addressed at the November 3rd hearing. We are especially interested in learning what information the Commission needs in order to (1) reinstate UVAs as a prescriptive option, or (2) correct the errors in the compliance modeling software to allow for UVAs as a performance option.

The SFC and other industry stakeholders are prepared to provide the Commission with data or information on SPF UVAs that can assist with the development of inclusive building energy standards that save energy in California homes.

We appreciate the opportunity to contribute to the process and look forward to a continuing conversation with staff as the Commission develops language for the 2016 Title 24 Standards. Given the schedule for the Title 24 update process, we request an opportunity to meet with the appropriate Commission staff prior to December 1, 2014.

If you have questions regarding this request, please contact our consultant Garth Torvestad at (209) 473-5000, gtorvestad@ConSol.ws, ConSol, or Justin Koscher, Director, at (202) 249-6617, Justin_Koscher@americanchemistry.com.

Regards,



Lee Salamone
Senior Director
Center for the Polyurethanes Industry